

JEROME J. REITANO, ESQUIRE
ID NO. 40121
P.O. Box 534
Wayne, PA 19087
(215) 864-9800

Attorney for: Plaintiff

**UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

MALIBU MEDIA, LLC, PLAINTIFF

vs

GREGORY WATSON

CIVIL ACTION NO: 2:14-cv-00695

**DEFENDANT'S ANSWER TO PLAINTIFF'S AMENDED
COMPLAINT**

1. The averments of Paragraph Number 1 require no response by answering defendant.
2. Denied, defendant is not a persistent online infringer of plaintiff's copyrights.
3. Denied, strict proof is demanded at trial.

JURISDICTION AND AVENUE

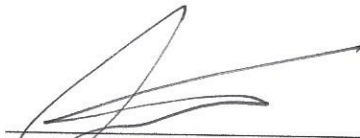
4. The averments of Paragraph 4 require no response by answering defendant.
5. Denied, the plaintiff is not a user of an IP address as defined in Plaintiff's complaint. Strict proof is demanded at trial.
6. The averments of Paragraph 6 require no response by defendant.
7. The averments of Paragraph 7 require no response by defendant.
8. The averments of Paragraph 8 require no response by answering defendant.

9. Admitted.
10. The averments of Paragraph 10 require no response by answering defendant.
11. The averments of Paragraph 11 require no response by answering defendant.
12. The averments of Paragraph 12 require no response by answering defendant.
13. The averments of Paragraph 13 require no response by answering defendant.
14. The averments of Paragraph 14 require no response by answering defendant.
15. The averments of Paragraph 15 require no response by answering defendant.
16. The averments of Paragraph 16 require no response by answering defendant.
17. The averments of Paragraph 17 require no response by answering defendant.
18. Denied, strict proof is demanded at trial.
19. Denied, strict proof is demanded at trial.
20. Denied, strict proof is demanded at trial.
21. Denied, strict proof is demanded at trial.
22. Denied, strict proof is demanded at trial.
23. The averments of Paragraph 24 require no response by answering defendant.
24. Denied, the averments of Paragraph 25 require no response by answering defendant.
25. Denied, the averments of Paragraph 26 require no response by answering defendant.
26. The averments of Paragraph 27 require no response by answering defendant.
27. The averments of Paragraph 28 require no response by answering defendant.
28. The averments of Paragraph 28 require no response by answering defendant.
29. The averments of Paragraph 29 require no response by answering defendant.
30. The averments of Paragraph 30 require no response by answering defendant.

31. The averments of Paragraph 31 require no response by answering defendant.
32. Denied, the defendant has not copied and distributed any elements of the original works of the plaintiff.
33. The averments of Paragraph 33 require no response by answering defendant.
34. Denied, the defendant did not file the plaintiff's exclusive rights.
35. Denied, the defendant did not infringe on the plaintiff's rights.

WHEREFORE, defendant Gregory Watson respectfully requests this court to dismiss plaintiff's complaint with prejudice.

6/18/14


Jerome Reitano, Esq
Attorney for Plaintiff